



ELACCA Submission to South Australian Royal Commission into Early Childhood Education and Care – 3-year-old preschool

February 2023



About ELACCA

The Early Learning and Care Council of Australia (ELACCA) was established to promote the value of quality early learning and care as an integral part of Australia's education system.

Our 19 CEO members include some of the largest early learning providers in the country, representing both not-for-profit and for-profit services.

ELACCA members operate 1,997 long day care services, 321 preschool/kindergarten services and 69 OSHC services, covering every state and territory. They offer one-quarter of all the early learning places in Australia. Together, our members serve 336,000 children and their families, and employ more than 53,000 staff.

As well as promoting the value of quality early learning and the need for greater public investment, ELACCA advocates for the right of all children to access quality early learning and care, particularly children facing disadvantage. We do this by drawing on the knowledge and practical experience of our members and representing their views to decision makers in government, the media and the public.

Recommendations to the Royal Commission – 3-year-old preschool provision in South Australia

The high-level recommendations below are informed by the detailed responses to the guided questions posed by the Royal Commission in calling for public submissions.

ELACCA recommends the Royal Commission consider the following action:

Access and equity

1. Every 3-year-old in South Australia be entitled to up to 5 days per week of quality early learning, in the service type of their choice.
2. Equity and access be considered in the design and implementation to ensure hard to reach, vulnerable and disadvantaged children and families benefit from (at least) two years of early learning before school, including:
 - a. barriers to attending early learning actively identified and removed
 - b. inclusion support funded adequately, including provision of outreach staff
 - c. place-based integrated children and family services are established.

Quality

3. South Australian Government investment in a targeted, public awareness campaign to:
 - a. build community understanding of the National Quality Standards and Early Years Learning Framework within the National Quality Framework
 - b. publicly identify quality preschool programs in different service types (including long day care), such as implementing a strategy like the Kinder/Kindy Tick in Victoria/Queensland.
4. Increased investment in the South Australian Education Board to ensure timely assessment and rating of service, including:
 - a. all services assessed and rated within a 3-year cycle
 - b. services rated as 'working towards' assessed every 12 months.

Workforce and delivery

5. South Australia align with other jurisdictions in recognising early childhood teacher qualifications as determined by the Australian Children's Education & Care Quality Authority (ACECQA).
6. South Australian Government consider and invest in targeted workforce initiatives to attract, retain and reattract quality early childhood educators and teachers, including:
 - a. Targeted scholarships, free vocational education and training and school-based traineeships.
 - b. Attract back campaigns and initiatives co-designed with peak bodies and the sector.
7. South Australian and Australian Governments share funding responsibilities in the provision of a 2 year preschool program that is free or near-free and affordable for all families, and where funding follows the child, to the service type chosen by their family.

ELACCA submission to the Royal Commission into Early Childhood Education and Care – 3-year-old preschool

Detailed responses to the Royal Commission’s guiding questions are provided in the following section. These were determined in collaboration with ELACCA’s South Australian Subcommittee of members.

What should every 3-year-old child in South Australia be entitled to in terms of early learning?

Every 3-year-old child in South Australia should have an entitlement of at least 7.5 hours per day, and up to 5 days per week of high quality early learning each week. Early learning should be prepared and delivered by a degree qualified early childhood teacher, in accordance with the Early Years Learning Framework. Every child should have access for the days and hours their family desires, and at the location and service type of their choice.

Early learning should be planned, intentional and play-based, to build the social, emotional, physical and cognitive skills children need to succeed in lifelong education, health, wellbeing and employment.

Whilst noting that ELACCA is a pro-vaccine organisation, some members have requested further consideration of the ‘no jab, no play’ policy for preschool and the misalignment with access requirements for primary school. The reasons noted are the barriers to, and disproportionately reduction of, access for children experiencing vulnerability and disadvantage.

In determining the optimal entitlement for 3-year-olds, ELACCA recommends a holistic approach to the sector, and a holistic approach to children’s development.

What should be the central aim of 3-year-old preschool? What are important but secondary aims?

The central aim of 3-year-old preschool is to scaffold children’s growth and development for an additional year before formal schooling, to help set them up for success in learning and in life.

The Australian Early Development Census provides evidence that many children are starting formal schooling lagging up to 2 years behind their peers, with that gap most likely to grow rather than diminish with time. Supporting early intervention, particularly important for children experiencing vulnerability, is also a primary aim. The percentage of children with two or more developmental vulnerabilities in South Australia (12.7%) is higher than the national percentage (11.7%)¹. In addition, many First Nations children experience developmental vulnerabilities in their early years that can be identified and supported through early intervention within a quality preschool program, regardless of the setting.

Significant, but secondary aims of 3-year-old preschool are the development of positive learning dispositions to support transition to school and school completion, as well as supporting workforce participation of parents and carers. Both of these aims result in economic benefits and productivity gains for South Australia.

¹ Australian Government (accessed January 2023), AEDC Percentage and number of children developmentally vulnerable in 2021, <https://www.aedc.gov.au/data-explorer/>

Defining key terms

What does universal preschool look like to you / your organisation? Does a universal program mean the same program design and service is offered to everyone? How would you define universal?

Universal preschool looks like a quality early learning program, delivered by a degree qualified early childhood teacher, in accordance with the approved National Quality Standard and Early Years Learning Framework.

Key features of universal preschool include:

- Planned, intentional and play-based pedagogy
- Place-based with no barriers to access via cost, geographic location, or cultural safety
- Right to access up to 5 days of early learning
- Ease of access for all children in the state, regardless of postcode or parental workforce participation
- A quality program that is agile to support each child's developmental trajectory and family workforce requirements and reflects the diversity of the population it is servicing
- Access to qualified educators and teachers supported by evidence based, ongoing professional development to enable depth of understanding and planning to enhance every child's developmental trajectory.

(How) should 3-year-old preschool differ to 4-year-old preschool?

Early childhood pedagogy should be consistent across birth to 8 years, scaffolding each child's growth and development for continuity of learning and appropriate for the child's developmental level. The age of the child attending preschool is largely irrelevant beyond meeting enrolment criteria and appropriate physical environments.

Programming and planning for 3-year-old and 4-year-old preschool should be based on informed observation, individual and group education plans and contextual to abilities and the cultural context, family and community environment.

There should be no difference in the pedagogical approach at preschools, other than the abilities of each child in the setting. A learning program should, therefore, be focussed on the outcomes for children irrespective of the type of setting in which they learn.

It is important to note that younger children are more likely to have additional personal requirements related to toileting and social and emotional needs.

The 2017 *Lifting Our Game Report*², noted broad support through consultations for universal access for 3-year-olds, with many stakeholders identifying it as "the single most important reform that the Review should consider". The Report notes that this is supported by international evidence, which has generally concluded that universal access to preschool for 3-year-olds as well as four year olds is preferred.

² S. Pascoe and D. Brennan, *Lifting Our Game: Report of the Review to Achieve Educational Excellence in Australian Schools through Early Childhood Interventions*, (2017), p.67

(How) should 3-year-old preschool differ to ECEC currently provided to 3-year-olds (e.g. in centre-based day care and family day care?)

Regardless of the setting, 3-year-old preschool should be delivered by a degree qualified teacher in accordance with the Early Years Learning Framework.

Preschool programs in all settings should be consistently delivering high quality early education and care irrespective whether they are centre-based long day care, stand-alone preschool, or those co-located with schools, if it is delivered by a degree qualified early childhood teacher in accordance with the approved Early Years Learning Framework.

It would be valuable for the South Australian Government to build family and community awareness about the Quality Standards in the National Quality Framework. It is important families understand the overall quality ratings of services including where they can access a preschool program delivered by a degree qualified early childhood teacher in a centre-based setting, such as that provided by ELACCA members. One strategy to achieve this is through a targeted awareness campaign, coupled with visible signage, to identify long day programs that provide a quality preschool program. The Queensland Kindy Tick, and Victorian Kinder Tick³ are recent successful examples for consideration.

Quality and innovation

What does high-quality 3-year-old early learning look like? What are the markers of optimal program delivery?

A high quality 3-year-old program is one that meets the National Quality Framework and is delivered by a degree qualified early childhood teacher, and:

- effectively balances child-led learning and intentional teaching within a play-based program
- offers formative and summative assessment
- meets the needs and interests of all children, and reflects the unique context of the families and community it services.

The program should engage children across all areas of development and importantly stimulate the essential executive function, intellectual, social and emotional learning that sets children up for life. The value and benefit of small group learning should be maximised by teacher and educator, with a targeted program that harnesses individual and small group learning and development.

High-quality preschool programs support parents and carers as well as children, embracing the holistic nature of the family.

Importantly, quality preschool should improve outcomes for all children, and be accessible particularly to children and families experiencing vulnerability or disadvantage. It should provide access for additional supports for all children, such as those requiring early intervention or disability support, regardless of the child or the service's ability to access funding. In other words, the scheme should provide access to funding for all services to ensure they can meet the individual needs of each child and provide inclusive education opportunities to every child and family who seeks to access early childhood education and care and provide parity of remunerate the educators and teachers with school based colleagues.

³ Victorian Government (12 October 2022) [Kinder Tick - information for services | Victorian Government \(www.vic.gov.au\)](https://www.vic.gov.au/kinder-tick-information-for-services)

For families to be assured that the preschool program is consistently high quality, they need to know that their service of choice is regularly assessed and rated within a maximum three year cycle, by the South Australian Education Standards Board, with adequate funding and support from the Department of Education. An improved rating and assessment cycle will lift quality more rapidly in conjunction with appropriate support for under-performing providers. To this end, ELACCA recommends that services rated as 'working towards' be assessed every 12 months.

What does high-quality look like in terms of time spent in preschool?

Children receive lifelong benefits having attended two years of quality preschool before starting school and 15 hours a week is the *minimum dosage* required for most children ⁴.

A quality preschool setting includes the following key features:

- a well-resourced service
- continuity of qualified teaching staff
- strong and responsive relationships between staff, children and families
- ability to meet the individual needs of children
- a calm, relaxed environment for children to learn and develop social and emotional skills
- culturally appropriate, and responsive of the environment and characteristics of its local community.

The outcome of attending a high-quality program should be a child who:

- is confident and capable, ready to transition to formal schooling, adequately equipped with essential executive function and self-regulation skills to succeed in learning
- has the social and emotional skills to form and sustain positive relationships with peers and teachers
- possesses a positive disposition to learning
- had had any atypical development identified and supported throughout their preschool journey and during their transition to formal schooling.

Quality is always best enabled when programs are delivered by a high-performing, stable workforce. Undergraduate degrees must provide a strong understanding of children's growth and development in accordance with the Early Years Learning Framework.

Professor Carla Rinaldi provided insights as her time as Thinker in Residence in South Australia: *"Teaching can exist if it is based on the learning processes of children as observed, experienced and documented. It is not simply to change the way of traditional teaching but learning how to teach based on the learning processes of children. It is a context in which the teacher has a concept of constant professional development."*⁵

⁴ S. Pascoe and D. Brennan, *Lifting Our Game: Report of the Review to Achieve Educational Excellence in Australian Schools through Early Childhood Interventions*, (2017), p.38

⁵ C.Rinaldi, *Re-imagining Childhood: The inspiration of Reggio Emilia education principles in South Australia*, Department of Premier and Cabinet (2012), p.25

(How) does quality differ for different cohorts of children?

Quality clearly differs across different cohorts of children, and should be acknowledged in how services are funded. Inclusion funding to support children and families with additional needs falls far short from what is required to adequately support vulnerable and disadvantaged cohorts.

Due to the complexity of children's needs, early childhood services located in very remote areas, or those with a high proportion of families and children experiencing vulnerability or disadvantage require a higher level of resourcing, including funding to attract, house and provide transport for degree qualified early childhood teachers. Growing each community's own qualified educators and teachers, should be a priority for remote services, including two-way learning and leadership through Indigenous and non-Indigenous co-directorship.

Place-based approaches that target and respond to different cultural needs and environments should be considered to ensure quality offerings to children who are hardest to reach, but have the most to gain from a quality preschool program.

Intensive support and proportionate universality that enables all children to have access to quality is acknowledged and required. Additional resources must be available in a timely and responsive manner, and enablers and barriers addressed to ensure equitable and transformative access for all children, families, and team members. Funding for dedicated family outreach staff, with the capacity to offer 'warm referrals', should be considered to increase access for hard to reach children.

Where is innovation happening in programming and service delivery? What does that look like?

As with quality, innovation requires time and significant financial investment to be realised.

Integrated child and family services are an excellent example of innovative program and service delivery. Noting there is an important distinction between an integrated building, and an adequately funded, high functioning, integrated service.

Services offering allied health assessments and related programs within day-to-day service delivery, in either an integrated or stand alone setting, are also worth exploring. Some excellent practice initiatives currently provided by the Victorian Government include: Flexible Support Packages, School Readiness Funding, Kindergarten Inclusion Support and Early Childhood Intervention Services (ECIS) allied health support ⁶.

Local examples in South Australia include: Your Town program in Playford ⁷ supporting families with children experiencing trauma-related challenges, and Goodstart Early Learning's partnership with Flinders University's Health2Go ⁸. This initiative in the Adelaide metropolitan area supports the detection of developmental delays and other health concerns in children from vulnerable or disadvantaged backgrounds. A similar developmental screening program has recently been announced by the NSW Government ⁹.

⁶ Victorian Government (October 2022) [Children with additional needs in early childhood | Victorian Government \(www.vic.gov.au\)](https://www.vic.gov.au/children-with-additional-needs-in-early-childhood)

⁷ Your Town (accessed January 2023) [Early Childhood Development Program | Elizabeth | yourtown](https://www.yourtown.vic.gov.au/early-childhood-development-program)

⁸ F. Lucas 'Goodstart partners with Flinders Uni to strengthen developmental screening in ECEC (thesector.com.au)', *The Sector*, 14 June 2022

⁹ New South Wales Government (28 November 2022) [Free development checks to give NSW kids the best start in life | NSW Government](https://www.nsw.gov.au/news-releases/free-development-checks-to-give-nsw-kids-the-best-start-in-life)

Workforce

In the context of the Shaping Our Future national ECEC workforce strategy and other recent announcements by Commonwealth and state governments:

What are the most important competencies for workers delivering 3-year-old preschool?

It is important that early childhood teachers and educators have the following competencies:

- In-depth and practical understanding of early childhood growth and development
- Ability to identify and respond to atypical growth and development (outside normative range)
- Capacity to translate this knowledge to individual and group developmental records/ education plans and pathways
- Capacity to build strong relationships with children and families, and to maintain across 3-year-old to 4-year-old preschool
- A strong understanding and practical application of the National Quality Framework
- Practices strongly embedded in early childhood pedagogies (including play-based, child-led and teacher-led intentional teaching and assessment)
- A strong understanding of the importance of children's agency and the image of the child as competent and capable
- Commitment to ongoing professional development that enhances practice, observation, critical reflection and children's outcomes.

What are the highest value interventions to improve workforce supply in South Australia?

The highest value intervention to improve workforce supply is to improve pay and conditions for early childhood teachers and educators. ELACCA supports pay parity of early childhood teachers and educators with relevant staff in primary schools.

Fully funded degree-qualified early childhood teachers would be a welcome and high value intervention from the South Australian Government, coupled with joint State and Federally funded educators. It is vital that the workforce is paid at a rate commensurate with their skills and experience.

Further, important interventions can be taken by investing in:

- Ongoing professional development for all teachers and educators
- Additional funded planning and programming time
- Incentives and scholarships, particularly targeted to hard-to-employ locations, or areas of high population growth (north of Adelaide)
- Intensive mentoring programs that provide wrap-around support, particularly for beginning teachers and educators
- Employment wellbeing support, including access to Employee Assistance Programs for all teachers and educators, regardless of setting.

Some ELACCA members have advocated that it would be highly beneficial if the accepted qualification in South Australia for an early childhood teacher was broadened. In the absence of a national early childhood teacher registration process, ELACCA recommends that the Teachers Registration Board of South Australia recognise all qualifications recognised by ACECQA.

The ability to more readily progress to Highly Accomplished Lead Teacher (HALT) status would also be of value to the sector, as well as opportunities to bridge primary teaching qualifications to early childhood degree.

In addition, better pathways, accelerated and innovative uplift programs for Diploma-qualified educators to progress through to teacher qualifications with financial and wrap-around support (such as those offered by Victoria and New South Wales) should be developed and encouraged in South Australia. The importance of linking the scholar, provider and university is crucial, therefore partnerships with employers are vital for qualification completion and retention in the sector.

In the event of the likely merger between the University of Adelaide and the University of South Australia, it is imperative that the number of places offered for early childhood teacher Bachelor degrees continue to increase to meet the future needs of the state.

What else should South Australia do in addition to workforce supply initiatives already underway?

The current workforce shortage has impacted the capacity of providers to employ early childhood teachers. In the absence of a much-needed national teacher registration process, it would be beneficial to bring the South Australian system in line with rules applying already in New South Wales, Victoria and Western Australia that recognise all early childhood teacher qualifications recognised by ACECQA.

In addition, we encourage South Australia to consider the following initiatives to support the attraction and retention of the early learning workforce:

- Attract-back promotions, such as ELACCA's recent *Big Roles in Little Lives* campaign¹⁰
- School-based traineeships and internships, and free VET courses for post-school students.
- Expansion of technical colleges, with a greater emphasis on pathways into early learning and care careers, including pathway to translate from vocational to tertiary qualifications
- Intensive Initial Teacher Education (ITE) degrees where students are able to work and study
- Funding and scholarships to support paid placements of staff attaining or upskilling qualifications (noting Bachelor of Education degrees requires 80 days of placement and Master of Teaching degrees requires 60 days of placement)
- Authorising and funding providers to pay educators and teachers to complete their paid placements as part of their employment
- Support through funding for early childhood teachers to work in, experience and learn from, regional and remote placement opportunities
- Fast tracked visa sponsorship opportunities for educators and teachers, and support for international teachers, through funding, with IELTS and LANTITE costs and tutoring
- Support discussion around multi-locational degrees
- Mentoring programs for pre-service and beginning teachers.

Workforce initiatives should be strongly informed by engagement with educators, teachers, peak bodies, Indigenous and culturally and linguistically diverse communities.

¹⁰ Early Learning and Care Council of Australia (2022), *Big Roles in Little Lives - ELACCA*, <https://elacca.org.au/big-roles-in-little-lives/>

Are there innovative approaches to building workforce supply that the Commission should consider?

There are opportunities to explore and scale-up existing innovative programs and approaches to building workforce supply, including upskill and uplift programs. This particularly includes successful initiatives developed through industry-university partnerships, for example, the *From the Ground Up* and *ITE Boost* programs co-designed with ELACCA and various Australian universities. *From the Ground Up* was recently profiled as case study by the Australian Government¹¹.

Innovative programs for targeted or hard to reach communities should also be considered, for example recognising and harnessing culturally safe practices through scholarships for the Indigenous workforce in the APY lands. Scholarships, professional development and a two-way learning exchange for Indigenous and non-Indigenous workforce could be explored.

Innovative teaching qualification pathways and scholarships such as those developed by the Victorian Government requires further consideration by the Commission.

Further, ongoing professional development, upskilling including individual growth plans for teaching staff, and mentoring for beginning early childhood teachers in collaboration with providers, should be considered and funded by the South Australian Government.

Delivery and administration

What is needed to support 3-year-old preschool? (What would you/your organisation need to do to be able to deliver 3-year-old preschool?)

Significant government investment is required to support a well-planned, collaborative roll-out of 3-year-old preschool across settings. This includes:

- Funding to support growth in salaries for the early childhood profession, and to reduce attrition rates across the workforce and make the sector more attractive for new entrants
- Investment in infrastructure to ensure there are sufficient and appropriate facilities across the state, in response to targeted provision planning activity
- Redistributed funding model to ensure government funding follows the child across all settings
- A targeted awareness and education campaign, funded by the South Australian Government and led by like-minded organisations, would be highly beneficial to deliberately shift perception of quality programs only being delivered in stand-alone preschool. Early childhood services, such as those run by ELACCA members, offer high quality preschool programs but this is not always understood or promoted within communities.

To underpin this investment, there is a requirement for a clear understanding of:

- How many 3-year-olds are currently attending early learning and what investment is needed to ensure those programs provide a quality early learning program
- The existing capacity of the sector to accommodate additional 3-year-olds and mapping that against unmet demand
- The barriers to accessing early learning and a deliberative strategy to address these (for example, cost, transport, cultural barriers).

¹¹ Australian Government (15 February 2023), *Early childhood case studies, Case Study: From the Ground Up* <https://www.education.gov.au/child-care-package/case-studies/case-study-ground>

What are the strengths of the current SA government administrative arrangements for delivering 4-year-old preschool programs (e.g. funding arrangements, parent fees, choice of providers)? What are areas for improvement?

Strengths of the current administrative arrangements for delivery 4-year-old preschool in South Australia include the following:

- The state government preschool system offers low-fee preschool options to families in purpose-built facilities
- It is a well-recognised, established system, valued by families, having been in place for many years.

However, the current state government preschool system does not address the growing need for families with two working parents or achieving National Preschool Agreement dosage.

The ABS census shows that the 5-day preschool fortnight in state preschools is not working for many families, with 45% of children enrolled only in state preschools not attending for 600 hours (that is, the third 'half' day), and 32% of families enrolled in preschool also attending at least one of their days in long day care (which is not funded for the additional day/s) ¹².

Funding of preschool programs in long day care settings allows the State to leverage Federal funding for childcare subsidies, enabling extended hours access for low-income families at a much lower cost than through the state preschool system.

As a priority, funding certainty for preschool provision would be welcomed by ELACCA members. Some additional areas identified for improvement include:

- Funding that supports parental choice on setting and provides generous fee relief for disadvantaged families who choose to access long day care settings, such as Victoria's \$2,400 fee relief for families, where the setting provides a preschool program
- Building a whole-of-government approach to early childhood development, building on the state's network of children's centres, and linking between early learning, child protection and maternal and child health
- Timeliness of funding arrangements – there can be a considerable lag in payment of fee relief for disadvantaged and vulnerable families creating cashflow challenges for providers. Other jurisdictions (for example, Queensland and Victoria) provide much closer to 'real time' funding for fee relief
- Preschool provision planning that considers the whole sector – currently state preschool provision extends into 'thin markets' which impacts the commercial viability of long day care provision in some areas.

To support planning and high-level data collection and analysis, the sector would also benefit from a nationally consistent online data system, housed by ACECQA. ELACCA has advocated for this and will continue discussions regarding its merit with the Australian and State Governments.

¹² ABS preschool data, ABS Preschool Education Australia 2021 Table 28, abs.gov.au

Who should be primarily responsible for paying for 3-year-old preschool? Who should share that responsibility?

3-year-old preschool should be free or near-free and affordable for all families regardless of the setting (long day care or state preschool). Commonwealth and State Governments have a joint responsibility to provide a quality preschool program for all children, with minimal financial burden on families, particularly those experiencing disadvantage.

The Royal Commission and South Australian Government are encouraged to consider arrangements in other jurisdictions such those jointly announced by New South Wales and Victoria in 2022 ¹³, or indeed Canada, which has recently announced early childhood reforms guaranteeing \$10 a day out of pocket expense for families ¹⁴.

It is important that the design of fee structure and associated messaging is nuanced and reflective of the whole sector. The South Australian Government is encouraged to liaise with providers to understand the benefits of New South Wales and Victorian strategies regarding the roll-out and implementation of 3-year-old preschool.

Learning from the experience in these states will inform South Australia's approach, target its messaging to families, and minimise unintended consequences on supply and accessibility.

Next steps

ELACCA values the opportunity to contribute this submission to the Royal Commission, and to participate in the invitational roundtable discussions.

Should the Royal Commission wish to engage in direct consultation with our members, we would be pleased to facilitate a discussion with our CEO members.

Please contact Elizabeth Death, CEO, on [REDACTED] or at [REDACTED]

Thank you for considering our submission.

¹³ Australian Government (16 June 2022), [Commonwealth welcomes additional funding from Victoria, NSW for early childhood education - Department of Education, Australian Government](#)

¹⁴ Government of Canada (23 July 2021) [Canada and Yukon announce major expansion of \\$10 a day child care - Canada.ca](#)



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